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April 15, 2025

Hon. Justice Pamela K. Chen and Hon. Justice James R. Cho, U.S.M.J.  
United States District Court  
Eastern District of New York  
Courtroom: 4F  
225 Cadman Plaza East  
Brooklyn New York 11201

Re: IME WatchDog, Inc. v. Gelardi, et al.  
Case No.: 1:22-cv-1032 (PKC) (JRC)

Dear Honorable Justice Chen and Hon. Justice Cho:

This office represents Eugene Liddie (Liddie) and IME LegalReps (IMELR), non-parties in the above-referenced action, (collectively “non-parties” herein).

The Plaintiff and the non-party Liddie and IMELR has reached a settlement in principle. Said non-parties are awaiting a written draft agreement to resolve this matter. Because the parties have reached a settlement in principle, Plaintiff agreed to consent to further extend the non-parties’ deadline to respond to the Plaintiff’s pre-motion conference to add him as a Defendant in this matter.

As a separate and unilateral extension request- made without consent of Plaintiff and in objection to: Non-party Liddie further seeks additional time to respond to any discovery requests pursuant to Justice Cho’s April 8, 2025 scheduling Order, disclosure’s related to the Court’s Third Amended Preliminary Injunction and make any objections to Plaintiff’s court ordered notice, if necessary. The time this office has expended to reach a settlement in principle has diverted our attention from complying with our deadlines for today April 15, 2025. The non-parties herein respectfully request April 25, 2025 as the new extension deadline for Liddie and IMELR to comply with the abovementioned Orders. There will be no prejudice in any way by granting the requested brief extensions. We thank the Court for its consideration of this request.

Respectfully Submitted,

  
KAREN CHARRINGTON, ESQ.  
Cc: Counsels of Record – via ECF